United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA G 0 3 0 0 9 1	10 08 12	~	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 30 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Delta Marine Industries, Inc. 1608 S 96th St. Seattle, WA 98108	10:00am 8/12/2010	12/2/2005
	Exit Time/Date 2:25pm 8/12/2010	Permit Expiration Date 11/2/2010

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Mark Giustino, HR director (206) 763-2383, ext. 247	SIC 3731 NAICS 336611

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Mark Giustino, HR director 1608 S 96th St. Seattle, WA 98108 (206) 763-2383, ext. 247	☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	✓ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
☐ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

RECEIVED
AUG 18 2010
U.S. EPA REGION 10
OFFICE OF COMPLIANCE AND ENFORCEMENT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Kristin McNeill	EPA/OCE (206) 553-6291	8/18/10
Sandra Brozusky	EPA/OCE (206) 553-5317	
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
		12/16/10

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS/PCS
2-19-2010

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
Compliance Inspection Report

Delta Marine Industries, Inc.

Seattle, Washington

August 12, 2010

Prepared by:
Kristin McNeill
Environmental Scientist
U. S. Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

Attachments:

Unless otherwise noted, all details in this inspection report were obtained from conversations with Mark Giustino or Ivor Jones, or from observations during the inspection.

I. Facility Information

Facility Name:	Delta Marine Industries, Inc.
Facility Contacts:	Mark Giustino, HR Director Ivor Jones, Co-Owner
Facility Address:	1608 S. 96th St Seattle, WA 98108
Facility Phone Numbers:	(206) 763-2383 (facility) (206) 763-2383 ext. 247 (Mr. Giustino) (206) 763-2383 ext. 221 (Mr. Jones)
Facility Type:	NAICS 336611 (Ship Building and Repairing) SIC 3731 (Ship Building and Repairing)
GPS location:	Lat: N 47.5167 Long: W 122.3067

II. Inspection Information

Inspection Date:	August 12, 2010
Arrival Time:	10:00 am
Departure Time:	2:25 pm
Weather Conditions:	Sunny and approximately 65°F
Purpose:	Determination of compliance with the Washington NPDES Boatyard General Permit number WAG030091 and the Clean Water Act

III. Permit Information

Delta Marine Industries, Inc. is currently operating under the Washington Department of Ecology National Pollutant Discharge Elimination System (NPDES) Boatyard General Permit number WAG030091. The general permit became effective on December 2, 2005, and expires on November 2, 2010.

IV. Owner and Operator Information

The facility is owned and operated by Delta Marine Industries, Inc. Ivor Jones and his brother, Jack Jones, are co-owners.

V. Facility Description

According to Mr. Giustino, the facility does some repairs, but mainly builds new boats that average 150 feet in length. The facility has been in operation at this location for 45 years (Attachments A and B). The nearest surface water is the Duwamish River, which borders the east side of the facility. The facility has several outfalls that directly discharge into the river.

VI. Individuals Present

Inspectors affiliated with the U.S. EPA Office of Compliance and Enforcement were Kristin McNeill and Sandra Brozusky. Jack Boller, an inspector from the U.S. EPA Office of Air, Waste, and Toxics, was also present to conduct a RCRA inspection.

Mark Giustino and Ivor Jones were present as representatives for the facility. They answered our questions and Mr. Giustino accompanied us on a facility tour.

VII. Inspection Entry

This was an unannounced inspection. Ms. Brozusky, Mr. Boller, and I arrived at the facility at 10:00 am on August 12, 2010. We presented our credentials to Mr. Giustino and Mr. Jones, and explained the purpose of our visit.

Mr. Giustino and Mr. Jones did not deny us access to the facility. We were allowed to inspect all areas that we wished to inspect.

VIII. Inspection Summary

After gaining access to the facility, I began the inspection with a brief opening conference to conduct introductions and to explain the purpose and expectations of the inspection. We then interviewed Mr. Giustino and Mr. Jones, conducted a facility tour, and held a brief closing conference to discuss inspection observations.

For this and other facilities in the Duwamish River watershed, EPA is assisting the Washington State Department of Ecology (Ecology) in conducting inspections to ensure proper stormwater management.

A. Records Review

The facility is required by the permit to have a Stormwater Pollution Prevention Plan (SWPPP) on site, which includes a site map. The facility's SWPPP was most recently updated in March 2010 (Attachment C). The permit also requires the facility to monitor stormwater five times per year for oil and grease, copper, zinc, lead, and total suspended solids (TSS), and to conduct weekly visual monitoring. The facility submits the discharge monitoring reports (DMRs) to Ecology. According to Mr. Giustino, the facility has consistently met water quality benchmarks.

B. Facility Tour

Mr. Giustino accompanied Ms. Brozusky, Mr. Boller, and I on a walk-through inspection of the facility. As the primary goal of the inspection was to determine if water exposed to the facility's processes was being allowed to flow into storm drains, we focused on inspecting

the exterior of the facility. We looked for possible water exposure to the facility's processes and stormwater pathways from the facility. Several stormwater best management practices (BMPs) are used at the facility, including fabric filters in storm drains and sediment settling tanks.

According to Mr. Giustino and Mr. Jones, sanitary wastewater from the facility is routed to the King County Valley View Sewer District. I did not observe floor drains on the interiors of the warehouses that could release process water into the sewer system.

According to Mr. Giustino, the facility does not generate process wastewater. Most of the manufacturing and repair occurs in enclosed warehouses. The painting of boats that are too large to fit in the paint booths in the warehouses occurs outside. At the time of inspection, there was a sailboat being repainted and the area was completely enclosed with tarps (photo 1).

Pressure washing and minor repairs also occur outside of the warehouses on the east side of the site. Pressure washing occurs in two locations, near the finger piers and near the crane, and is used to clean the hulls after the boats are removed from the water (photos 2 – 4). There are approximately 120 feet between the repair shop warehouse and the river in which pressure washing occurs. There are sumps at each location that are capped during washing. When pressure washing is not occurring, the sumps are left open so stormwater does not pool in the sumps. The outfall pipes from the sumps discharge directly into the Duwamish River, and are where samples are collected for stormwater analysis for Ecology (photo 5). Following pressure washing, the wash water collected in the sumps is pumped into the facility's evaporation system (photo 6). The sediment remaining in the evaporation system is collected, tested, and disposed of properly (photo 7). No painting or fiberglass repair occurs while boats are in the river.

Minor repairs and pressure washing of small vessels also occur outside of the warehouses, on the northeast side of the facility. There is also a sump in this area to collect wash water that is pumped into totes and put into the evaporation system (photo 8). There are several slot drains in the repair area, but according to Mr. Giustino, they are dead ended and any water collected in the drains is allowed to evaporate (photo 9).

There are approximately 75 storm drains in the parking lot and paved areas of the approximately 25 acre site. The storm drains are indicated on the facility map in Attachment C. Stormwater from parking lots and roofs at the facility flows into storm drains that are connected to two 5' x 20' BaySaver tanks to allow sediment to settle out before the water is released into the Duwamish River. Fabric filters are also used on storm drains at the facility to reduce sediment in the stormwater. The filters are cleaned out three or four times per year.

During the walk-through inspection, we observed a mechanical saw that used a lubricant diluted with water to facilitate the blade cutting through metal. The excess water and lubricant mixture was allowed to pool on the ground under the saw (photos 10 and 11). At the time of inspection, the liquid was approximately 25 feet from a nearby storm drain (photo 12). See the Areas of Concern section for more information.

Following the facility tour, we concluded the inspection with a closing conference with Mr. Giustino in which we discussed observations from the inspection. We left the facility at 2:25 pm on August 12, 2010.

IX. Areas of Concern

We conducted an interview with Mr. Giustino and Mr. Jones, and a walk-through inspection in which we examined the interior and exterior of the facility. Information obtained during the inspection included the identification of three areas of concern.

A. Stormwater Pollution Prevention Plan (SWPPP)
According to permit section S5, "the SWPPP must be ... updated as necessary to maintain compliance with permit conditions." Although the SWPPP was updated by the facility in March 2010, several sections had not been modified to reflect the current conditions at the facility. In addition to general updates, the following areas should be addressed:

- According to permit section S5.B.1.a., the SWPPP must include a facility description.
- The facility should clarify the monitoring plan (SWPPP section 5.4) following permit section S5.B.2.
- The facility should clarify the inspection plan (SWPPP section 5.1) following permit section S5.B.3.a.vi.

B. Visual monitoring schedule
According to the schedule in permit section S3.B, the facility should be conducting weekly visual monitoring of stormwater discharges, in addition to analyzing stormwater samples five times per year. In the SWPPP, the facility indicates that they are conducting quarterly visual monitoring (SWPPP section 5.4), which is not as frequent as the permit requires.

C. Discharge of process wastewater
During the walk-through inspection, we observed a mechanical saw that used a lubricant diluted with water to facilitate the blade cutting through metal. Although Mr. Giustino stated that the facility does not generate any process wastewater, the water used to dilute the lubricant is used in normal processes performed at the facility. The excess water and lubricant mixture was spilling over the containment around the saw and was pooling on the ground under the saw (photos 10 and 11). Mr. Giustino stated that he thought the lubricant was water-based. Mr. Giustino also stated that the liquid enters a storm drain when there is enough to run toward the drain. At the time of inspection, the liquid was not entering the storm drain, but was approximately 25 feet from the drain (photo 12). Mr. Giustino said, "I don't know if this is how it should be disposed of."

The MSDS for the lubricant (Chevron Soluble Oil B, NB) was readily available (Attachment D). According to the MSDS, the lubricant is oil-based and forms an emulsion with water (i.e., the oil is suspended in the water; it is not dissolved). Section 7 of the MSDS (Handling and Storage) states that the facility should "avoid ... releasing this material into sewage and drainage systems and bodies of water."

According to permit section S2.C.1. (Stormwater Limitations), "The discharge of process wastewater is prohibited." According to Mr. Giustino, when enough of the water and lubricant mixture is used, it enters a storm drain that ultimately discharges into the Duwamish River.

Report Completion Date: 12/16/10

Lead Inspector Signature:

Kristin McNeill
Environmental Scientist
U. S. Environmental Protection Agency
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit
(206) 553-6291

Attachment A: Photograph Documentation

(Photos taken by K. McNeill and S. Brozusky on August 12, 2010)

Photo 1. Tarped sailboat being repainted.

Photo 2. Grate over the sump near finger piers that is capped during pressure washing.

Photo 3. Overview of area near crane where pressure washing occurs.

Photo 4. Grate over the sump near crane.

Photo 5. Outfall pipe from sump near crane.

Photo 6. Evaporation system.

Photo 7. Sediment from evaporation system waiting to be tested and disposed of.

Photo 8. Sump in small vessel repair area, with collection tote in the background.

Photo 9. Dead ended slot drain in small vessel repair area.

Photo 10. Saw that uses water and lubricant (tan colored liquid) to facilitate cutting through metal.

Photo 11. Excess water and lubricant pooling on the ground under the saw.

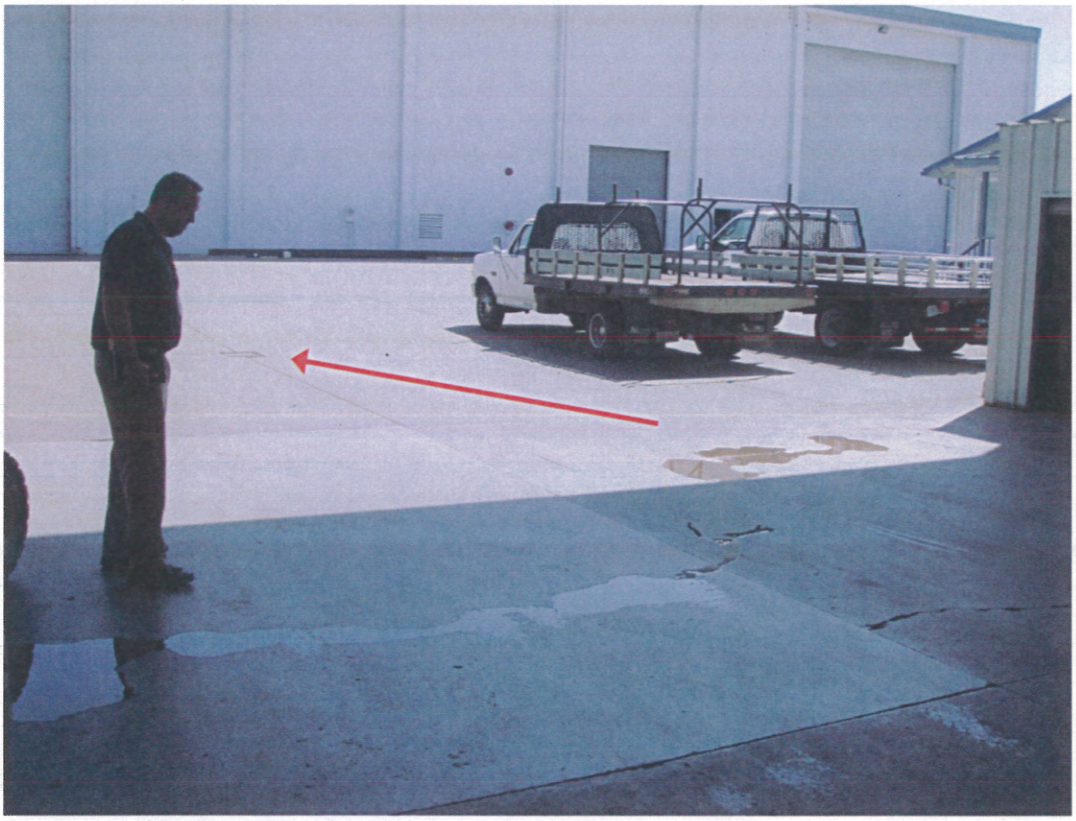
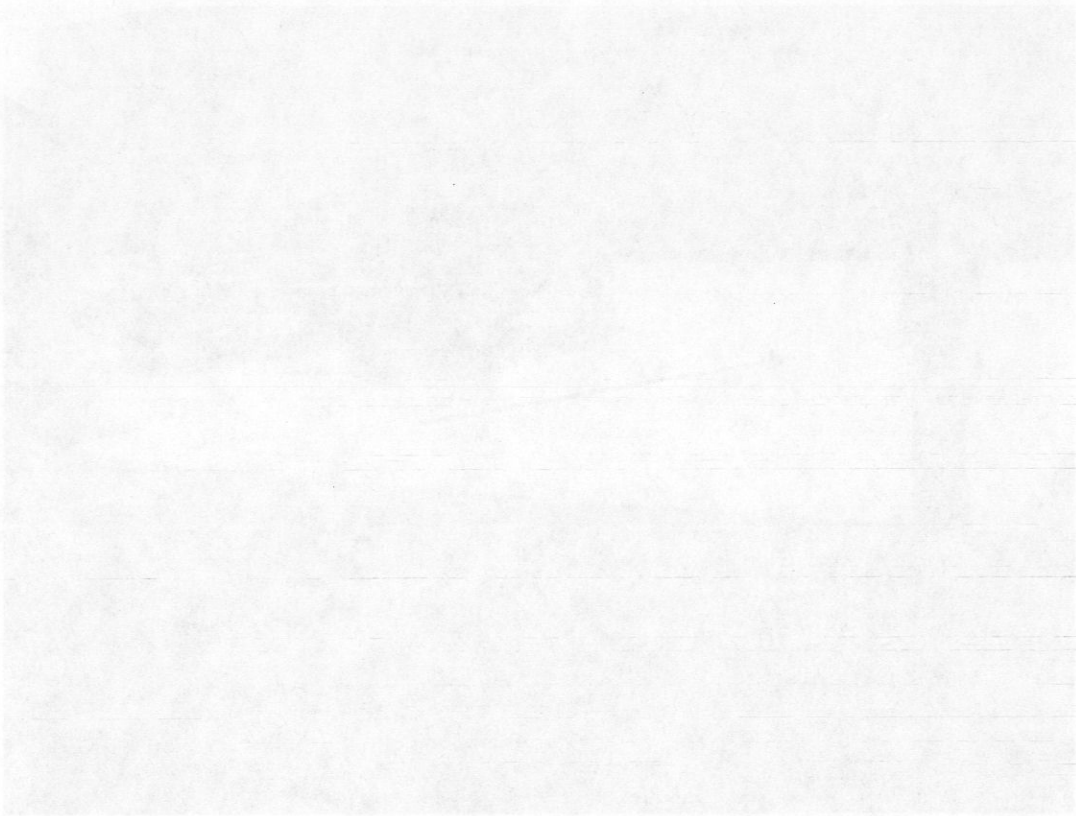


Photo 12. Water and lubricant running toward a storm drain.



Attachment B: Aerial photo
(image from Google Earth Pro)

ATTACHMENT C

Delta Marine Industries, Inc.

Storm Water Pollution Prevention Plan (SWPPP)

and site map

Delta Marine Industries, Inc.
Storm Water Pollution Prevention Plan

Table of Contents

General Facility Information

Name of Facility: Delta Marine Industries, Inc.

Facility Address: 1608 S 96th St Seattle, WA 98108

Facility Contact: Mark A. Giustino

Title: Human Resource Director

Telephone: 206-763-2383

Fax: 206-764-9809

Mailing Address: same as above

Owner: Ivor and John R. Jones

Operator: Delta Marine Industries, Inc.

Standard Industrial Classification (SIC) Code: 3732

Permit Information:

Facility Permit Name: Delta Marine Industries, Inc.

Permit #: WAG030091

Initial Date of Coverage: 12/8/97

Number of Storm Water Outfalls: 55

Receiving Waters: Duwamish Waterway

Emergency Contact:

Name: Steve Millard

Telephone: 206-790-5468

1.0 OVERVIEW

1.1 INTRODUCTION

This storm water pollution prevention plan (SWPPP) covers the operations at Delta Marine Industries, Inc. It has been developed as required under the National Pollutant Discharge Elimination System (NPDES) Boatyard General Permit. This SWPPP describes this facility and its operations, identifies potential sources of storm water pollution at the facility, recommends appropriate best management practices (BMPs) or pollution control measures to reduce the discharge of pollutants in storm water runoff, and provides for periodic review of this SWPPP.

1.2 OBJECTIVES

The primary goal of the storm water permit program is to improve the quality of surface waters by reducing the amount of pollutants potentially contained in the storm water runoff. Boatyards subject to the NPDES permit must prepare and implement a SWPPP.

This SWPPP will:

1. identify sources of storm water and non-storm water contamination to the storm water drainage system.

2. identify and prescribe appropriate "source area control" type best management practices designed to prevent storm water contamination from occurring.

3. identify and prescribe "storm water treatment type best management practices to reduce pollutants in contaminated storm water prior to discharge.

4. prescribe actions needed either to bring non-storm water discharges under NPDES permit or to remove these discharges from the storm drainage system.

5. prescribe an implementation schedule so as to ensure that the storm water management actions prescribed in the SWPPP are carried out and evaluated on a regular basis.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for developing, implementing, maintaining and revising this SWPPP. The members of the team are familiar with the management and operations of Delta Marine.

Mark Giustino, HR Director, SWPPP Team Director
Duties: Conduct program evaluations, conduct training, record keeping

Steve Millard, Facilities Lead, SWPPP Team Leader
Duties: Maintenance of BMPs, spill response

Brian Speedy, Maintenance Lead

Duties: Maintenance of BMPs, spill response

Ahmed Mohammed, Tri Nguyen, Phuc Vu, Maintenance Workers
Duties: Spill response

3.0 POTENTIAL SOURCES OF POLLUTANTS

3.1 Site Map
-see attached

3.2 Summary of Sampling Data
-n/a

3.3 Inventory of Potential Sources of Contamination

The following have been identified as potential sources of storm water contamination.

- Pressure wash debris at EOS sump
- Garbage dump
- Resin dumps
- Resin tanks
- Resin/gel-coat/paint/solvent drums & buckets
- Still room use
- Vehicle leaks and maintenance
- Dirt piles
- Any other areas capable of contaminating storm water runoff.

4.0 OTHER PLANS INCORPORATED BY REFERENCE

-NPDES General Boatyard Permit

5.0 BEST MANAGEMENT PRACTICES

Storm water management controls, or best management practices (BMPs) will be implemented to reduce the amount of pollutants discharged from Delta Marine.

5.1 SOURCE AREA CONTROL

To the maximum extent practicable, and to the extent it is cost effective, the use of source area control best management practices designed to prevent storm water from becoming contaminated will be used. Source area control BMPs that are either proposed or in place are indicated on the attached drainage base map described in subsection (3.1).

Erosion Control Measures

Areas prone to soil erosion shall be protected, and the soil kept out of the storm water discharge.

-Any piles of loose dirt from building construction shall be tarped.

Good Housekeeping

Good housekeeping practices shall be implemented to maintain a clean and orderly work environment and to reduce the potential for significant materials to come in contact with storm water.

- Sweep all work areas daily
- Zamboni all paved areas on a weekly basis
- Tarp over the main garbage dumpster when not filling
- Pressure washing done only in approved areas

Preventive Maintenance

The following activities will be included in the preventive maintenance program.

- Daily inspection of all company vehicles for leaks
- Daily inspection of resin pump stations
- Monthly checks of spill kit drums
- Check garbage dump at end of each shift for tarp
- Inspect pressure wash collection sumps for proper operation after each use

Regular Visual Comprehensive Inspections

The NPDES General Boatyard Permit requires inspection and collection of storm water runoff samples five times per year in January, April, May, September and October. These inspections must be conducted in a runoff event. Records of these inspections and samples must be kept on file with the SWPPP.

Spill Prevention and Response Procedures

- Wherever possible loads will be off loaded indoors to minimize risk of a spill running to a storm drain.
- Regularly stored hazardous liquids shall be stored with adequate catch basins underneath.
- The Human Resource Director and the Maintenance Department shall be responsible for spill response.

There are three spill response drums in the facility. They are located at the acetone tank on the East wall of the Glass Shop, in the South Finish Shop, and at EOS.

Employee Training

The Human Resource Director and the Maintenance Department shall conduct annual training to increase preparedness for any spill event.

All employees shall be made aware of the SWPPP through discussion items at Delta's monthly safety meetings.

5.2 RESIDUAL POLLUTANTS

There are no known residual pollutants at this time.

5.3 STORMWATER TREATMENT BEST MANAGEMENT PRACTICES

Preventive Measures
Filters with oil separators will be placed in all storm drains and changed on a bi-annual basis.

Diversions
The wash pad in next to the derrick crane at EOS diverts all water to the collection sump which is then run through the evaporator, no to storm drains.

5.4 FACILITY MONITORING

Monitoring includes site inspections as well as the collection and analysis of storm water samples. The purpose of monitoring is to: a) evaluate storm water outfalls for the presence of non-storm water discharges, and b) evaluate the effectiveness of the companies pollution prevention activities in controlling contamination of storm water discharges.

NON-STORM WATER DISCHARGES
All storm water outfalls shall be evaluated for non-storm water contributions to the storm drainage system for the duration of this permit. Any monitoring shall be representative of non-storm water discharges from the facility. Any unauthorized storm water discharges must be eliminated, or covered under another NPDES permit.

1. Evaluations shall take place during dry periods, and may include either end of pipe screening or detailed testing of the storm sewer collection system.

2. Evaluation results shall be kept with this permit

3. If outfalls cannot be evaluated for non-storm water discharges the Human Resource Director shall sign a statement certifying the inability to comply with this requirement.

ANNUAL FACILITY SITE COMPLIANCE INSPECTION

The Human Resource Director shall make an annual inspection to evaluate the effectiveness of the SWPPP. The inspection shall be adequate to verify that the site drainage conditions and potential pollution sources identified in the SWPPP remain accurate, and that the best management practices in the SWPPP are being implemented, properly operated, and adequately maintained. Information reported shall include the inspection date, inspection personnel, scope of the inspection, major observations, and revisions needed in the SWPPP.

QUARTERLY VISUAL MONITORING

The Human Resource Director shall perform and document quarterly visual inspections of storm water discharge quality at each storm water discharge outfall. Inspections shall be conducted within the first 30 minutes of discharge or as soon thereafter as practical, but not exceeding 60 minutes. The inspections shall include any observations of color, odor, turbidity, floating solids, foam, oil sheen, or other obvious indicators of storm water pollution.

6.0 RECORD KEEPING AND RECORDING

All records shall be kept in accordance with the Delta Marine NPDES General Boatyard Permit.

7.0 CERTIFICATION OF THE SWPPP

I certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information contained in the plan. Based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information: the information contained in this document is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for providing false information, including the possibility of fine and imprisonment. In addition, I certify under penalty of law that, based upon my knowledge and belief, the provisions of this document adhere to the provisions of the storm water permit for the for the facility and implementation of the Storm Water Pollution Prevention Plan and that the plan will be complied with.

_____ _____

Mark A. Giustino, Human Resource Director Date


LEGEND:
STORM DRAIN
GATE
WAREHOUSE
FIBERGLASS SHOP
PARKING
OFFICE
METAL SHOP
METAL SHOP
BREEZEWAY
WOOD SHOP
GATE
W FINISH SHOP
E FINISH SHOP
GUARD SHACK
OWNER'S REPRESENTATIVE OFFICES
PARKING
DIAMOND OFFICE
DIAMOND PAINTING
SMALL REPAIR SHOP
PAINT SHOP
GATE
STORAGE
REPAIR SHOP
REPAIR SHOP
REPAIR SHOP
CRANE
OUTFITTING FLOATS
REPAIR SHOP
SOUTH FINISH SHOP
14TH AVENUE SOUTH
SOUTH 96TH STREET

ATTACHMENT D

MSDS for Chevron Soluble Oil B, NB

5/900

Material Safety Data Sheet

Chevron Soluble Oil B, NB

MSDS: 7090 **Revision #:** 3 **Revision Date:** 09/18/01

Click here to search the product data sheet database

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1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON Soluble Oil

PRODUCT NUMBER(S): CPS230308 CPS233703 CPS255752 CPS255754
SYNONYM: CHEVRON Soluble Oil B
CHEVRON Soluble Oil NB
CHEVRON Soluble Oil T1
CHEVRON Soluble Oil T2

COMPANY IDENTIFICATION

Chevron Products Company
Lubricants and Specialty Products
6001 Bollinger Canyon Rd., T3325/B10
San Ramon, CA 94583
www.chevron-lubricants.com

EMERGENCY TELEPHONE NUMBERS

HEALTH (24 hr): (800)231-0623 or
(510)231-0623 (International)
TRANSPORTATION (24 hr): CHEMTREC
(800)424-9300 or (703)527-3887
Emergency Information Centers
are located in U.S.A.
Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request:(800)414-6737 email:lubemsds@chevron.com
Environmental, Safety, & Health Info: (925) 842-5535
Product Information: (800) 582-3835

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2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON Soluble Oil

CONTAINING

COMPONENTS	AMOUNT	LIMIT/QTY	AGENCY/TYPE
LUBRICATING BASE OIL CONTAINING ONE OR MORE OF THE FOLLOWING	> 70.00%		
HYDROTREATED DIST., HVY NAPHTH Chemical Name: DISTILLATES, HYDROTREATED HEAVY NAPHTHENIC CAS64742525		5 mg/m3 (mist) 10 mg/m3 (mist) 5 mg/m3 (mist)	ACGIH TWA ACGIH STEL OSHA PEL
HYDROTREATED DIST., LT NAPHTH			

Chemical Name: DISTILLATES, HYDROTREATED LIGHT NAPHTHENIC

CAS64742536		5 mg/m3 (mist)	ACGIH TWA
		10 mg/m3 (mist)	ACGIH STEL
		5 mg/m3 (mist)	OSHA PEL

ADDITIVES INCLUDING THE FOLLOWING
< 30.00%

2-BUTOXYETHANOL
Chemical Name: ETHANOL, 2-BUTOXY

CAS111762	< 2.50%	25 ppm	ACGIH TWA
		240 mg/m3	OSHA PEL

2-METHYL-2,4-PENTANEDIOL
Chemical Name: 2-METHYL-2,4-PENTANEDIOL

CAS107415		25 ppm	ACGIH TWA
		125 mg/m3	OSHA CEILING

COMPOSITION COMMENT:
All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

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3. HAZARDS IDENTIFICATION

********** EMERGENCY OVERVIEW **********

Dark liquid.

- CAUSES SKIN IRRITATION
- OIL MIST MAY CAUSE RESPIRATORY IRRITATION
- WATER EMULSIONS OF METALWORKING FLUIDS MAY BECOME CONTAMINATED WITH HARMFUL MICROORGANISMS

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IMMEDIATE HEALTH EFFECTS
EYE:
Not expected to cause prolonged or significant eye irritation.
SKIN:
Contact with the skin causes irritation. Not expected to be harmful to internal organs if absorbed through the skin.
INGESTION:
Not expected to be harmful if swallowed. See Section 11 for additional information.
INHALATION:
Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit. See Section 11 for additional information.
SIGNS AND SYMPTOMS OF EXPOSURE:
Skin irritation: may include pain, reddening, swelling, and blistering.

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4. FIRST AID MEASURES

EYE:
No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.
SKIN:
Wash skin immediately with soap and water and remove contaminated clothing and shoes. Get medical attention if irritation persists. Discard contaminated clothing and shoes or thoroughly clean before reuse.
INGESTION:
No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person.
INHALATION:
If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

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5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:
Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.
FLAMMABLE PROPERTIES:
FLASH POINT: (COC) 320F (160C)
AUTOIGNITION: NDA
FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA
EXTINGUISHING MEDIA:
CO2, Dry Chemical, Foam, Water Fog
NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.
FIRE FIGHTING INSTRUCTIONS:
This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.
COMBUSTION PRODUCTS:
Normal combustion forms carbon dioxide, water vapor and may produce oxides of sulfur and nitrogen. Combustion may form oxides of sodium. Incomplete combustion can produce carbon monoxide.

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6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887
International Collect Calls Accepted
ACCIDENTAL RELEASE MEASURES:
Stop the source of the leak or release. Clean up releases as soon as possible, observing precautions in Exposure Controls/Personal Protection. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

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7. HANDLING AND STORAGE

Emulsions of soluble metalworking fluids and water may become contaminated

with harmful microorganisms such as bacteria and fungus which can cause illness and infection. This can occur even in emulsions with fluids which initially contain some biocide because the biocide can be depleted during service. A metalworking fluid maintenance program should be followed in order to control this hazard. Such a program may require the use of biocides. For information, contact Chevron at 1-800-LUBE-TEK or lubetek@chevron.com.

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water. Do not breathe oil mist at concentrations above the recommended mineral oil mist exposure limit. Do not get in eyes, on skin, or on clothing. Wash thoroughly after handling.

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8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:
Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS
Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION:
No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice.
SKIN PROTECTION:
Wear impervious protective clothing to prevent skin contact. Selection of protective clothing may include gloves, apron, boots, and complete facial protection and will depend on operations conducted. Users should determine acceptable performance characteristics of protective clothing. Consider physical requirements and other substances present when selecting protective clothing. Suggested materials for protective gloves include: <Viton> <Nitrile> <Chlorinated Polyethylene (or Chlorosulfonated Polyethylene or CPE)> <Silver Shield>
RESPIRATORY PROTECTION:
No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:
Dark liquid.

pH:	NA
VAPOR PRESSURE:	NDA
VAPOR DENSITY (AIR=1):	Heavier than air.
BOILING POINT:	>212F (>100C)
FREEZING POINT:	NA
MELTING POINT:	NA
SOLUBILITY:	Forms a stable emulsion with water.
SPECIFIC GRAVITY:	0.93 @ 15.6/15.6C
VOLATILE ORGANIC COMPOUNDS (VOC):	10.5 wt. %, 97.65 g/l (estimated)
VISCOSITY:	38.0 cSt @ 40C (Typ.)

10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:
None known.
CHEMICAL STABILITY:
Stable.
CONDITIONS TO AVOID:
No data available.
INCOMPATIBILITY WITH OTHER MATERIALS:
May react with strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.
HAZARDOUS POLYMERIZATION:
Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:
The mean 24-hour Draize eye irritation score in rabbits is 8/110.
SKIN EFFECTS:
For a 4-hour exposure, the Primary Irritation Index (PII) in rabbits is: 4.2/8.0 (undiluted). The acute dermal LD50 in rats is >2.0 g/kg. This material did not cause sensitization reactions in a Modified Buehler guinea pig test.
ACUTE ORAL EFFECTS:
The acute oral LD50 in rats is >5.0 g/kg.
ACUTE INHALATION EFFECTS:
The acute respiratory toxicity is based on data for a similar material.
ADDITIONAL TOXICOLOGY INFORMATION:
This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

This product contains 2-methyl, 2,4-pentanediol which may produce local irritation on contact and central nervous system depression following systemic absorption.

This product contains 2-butoxyethanol which caused the following effects in laboratory animals: anemia, kidney damage, lung damage and blood abnormalities. Humans appear to be less sensitive to the toxic effects. 2-butoxyethanol was toxic to the embryo and fetus of pregnant rats and rabbits exposed by inhalation.

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12. ECOLOGICAL INFORMATION

ECOTOXICITY:
The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.
ENVIRONMENTAL FATE:
This material is not expected to be readily biodegradable.

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13. DISPOSAL CONSIDERATIONS

Place contaminated materials in disposable containers and dispose of in a manner consistent with applicable regulations. Contact local environmental or health authorities for approved disposal of this material.

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14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE
DOT HAZARD CLASS: NONE
DOT IDENTIFICATION NUMBER: NONE
DOT PACKING GROUP: N/A
ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT.
ADR/RID Hazard class - Not applicable.

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15. REGULATORY INFORMATION

SARA 311 CATEGORIES:	1. Immediate (Acute) Health Effects:	YES
	2. Delayed (Chronic) Health Effects:	NO
	3. Fire Hazard:	NO
	4. Sudden Release of Pressure Hazard:	NO
	5. Reactivity Hazard:	NO

REGULATORY LISTS SEARCHED:

01=SARA 313	11=NJ RTK	22=TSCA Sect 5(a)(2)
02=MASS RTK	12=CERCLA 302.4	23=TSCA Sect 6
03=NTP Carcinogen	13=MN RTK	24=TSCA Sect 12(b)
04=CA Prop 65-Carcin	14=ACGIH TWA	25=TSCA Sect 8(a)

05=CA Prop 65-Repro Tox | 15=ACGIH STEL | 26=TSCA Sect 8(d)
06=IARC Group 1 | 16=ACGIH Calc TLV | 27=TSCA Sect 4(a)
07=IARC Group 2A | 17=OSHA PEL | 28=Canadian WHMIS
08=IARC Group 2B | 18=DOT Marine Pollutant | 29=OSHA CEILING
09=SARA 302/304 | 19=Chevron TWA | 30=Chevron STEL
10=PA RTK | 20=EPA Carcinogen | 31=OSHA STEL

The following components of this material are found on the regulatory lists indicated.

2-METHYL-2,4-PENTANEDIOL
is found on lists: 02,10,11,13,14,28,29,
ETHANOL, 2-BUTOXY
is found on lists: 01,02,10,11,13,14,17,26,28,
DISTILLATES, HYDROTREATED HEAVY NAPHTHENIC
is found on lists: 14,15,17,
DISTILLATES, HYDROTREATED LIGHT NAPHTHENIC.
is found on lists: 02,14,15,17,

EU RISK AND SAFETY LABEL PHRASES:
R38: Irritating to skin.
R53: May cause long-term adverse effects in the aquatic environment.
S 36/37: Wear suitable protective clothing and gloves.
NEW JERSEY RTK CLASSIFICATION:
Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows:
PETROLEUM OIL
WHMIS CLASSIFICATION:
Class D, Division 2, Subdivision B: Toxic Material
-Skin or Eye Irritation

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16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0;
HMIS RATINGS: Health 2; Flammability 1; Reactivity 0;
(0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:
This revision updates Section 15 (Regulatory Information).

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV	- Threshold Limit Value	TWA	- Time Weighted Average
STEL	- Short-term Exposure Limit	TPQ	- Threshold Planning Quantity
RQ	- Reportable Quantity	PEL	- Permissible Exposure Limit
C	- Ceiling Limit	CAS	- Chemical Abstract Service Number
A1-5	- Appendix A Categories	()	- Change Has Been Proposed
NDA	- No Data Available	NA	- Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Reply To
Attn Of: OCE-133

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

WARNING LETTER

Mark Giustino, HR Director
Delta Marine Industries, Inc.
1608 South 96th Street
Seattle, Washington 98108

Re: August 12, 2010, NPDES Compliance Inspection
Permit Number WAG030091

Dear Mr. Giustino:

On behalf of the United States Environmental Protection Agency (EPA), I would like to express my appreciation for your facility's time and cooperation during the August 12, 2010, National Pollutant Discharge Elimination System (NPDES) inspection. The purpose of the inspection was to gather information regarding your operation as a part of an overall and ongoing evaluation of the compliance status of your facility with the NPDES Permit WAG030091 ("Permit"). During the inspection, several violations of the Permit were noted.

Part S5 of the Permit specifies that the Stormwater Pollution Prevention Plan (SWPPP) must be updated as necessary to maintain compliance with permit conditions. This part of the permit specifies that the SWPPP contain such things as a facility description and inspection plan. The inspector noted that several of the items in the SWPPP were either missing on in need of clarification. Failure to assure that the SWPPP contents are consistent with permit requirement is a violation of Part S5 of the Permit.

Part S3.B of the Permit specifies that storm water discharges shall be visually monitored once per week. In addition, Part S5 of the Permit specifies that each facility covered by the Permit must prepare and maintain a Storm Water Pollution Prevention Plan (SWPPP) specifically developed for their facility. The permit also specifies that the SWPPP must be consistent with permit requirements. At the time of the inspection, the inspector noted that the SWPPP specifies that visual monitoring of storm water discharges is to be conducted quarterly instead of weekly as required in the Permit. Failure to assure that the SWPPP contents are consistent with permit requirements is a

violation of Part S5 of the Permit.

Part S2.C.1. of the Permit specifies that the discharge of process wastewater is prohibited. At the time of the walkthrough portion of the inspection, the inspector noted a mechanical saw used for cutting metal. This saw apparently uses a lubricant and water mixture to facilitate cutting process. The inspector also noted that the water and lubricant mixture was spilling over the containment around the saw and was pooling on the floor near the saw. This pooled liquid was situated approximately twenty-five feet from a floor drain that discharges to the Duwamish River.

Although the inspector did not observe this pooled lubricant mixture enter the storm drain at the time of the inspection, failure to prevent this lubricant mixture from entering this drain is a violation of Part S2.C.1. of the Permit.

Although EPA exercises every precaution to ensure accurate inspection findings, we do not want to dismiss the possibility that the inspector may have failed to observe certain other areas of noncompliance. Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the facility. As such, I want to strongly encourage your facility to continue its efforts to maintain full knowledge of the Permit requirements and to take appropriate measures to ensure compliance.

Please do not hesitate to contact us with any questions regarding this letter. If you have any questions, please call Joe Roberto at 206-553-1669.

Sincerely,

Kimberly A. Ogle, Manager
NPDES Compliance Unit

Enclosure

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

WARNING LETTER

Jeff McCray, Plant Manager
McCain Foods USA, Inc.
218 West Hwy 30
Burley, Idaho 83318

Re: February 3, 2010, NPDES Compliance Inspection
Permit Number ID0000612

Dear Mr. McCray:

Bcc: Jim Werntz, IOO